



C L E P A
*European Association of
Automotive Suppliers*

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POSITION PAPER

CLEPA Position Paper on CO₂ reduction from light commercial vehicles

Background: Action on CO₂ from light commercial vehicles (LCVs) is part of the 10g package of complementary measures of the EC strategy to reduce CO₂ emissions from passenger cars and LCVs. A proposal on LCVs is expected in October 2009 or early 2010. Many of the "smaller" LCVs are built on the same platform as cars. Others are built on specific platforms and tend to have longer lead-times. The CO₂ passenger cars Regulation has recently been adopted and contains a number of flexibilities for implementation, including rewards for eco-innovations and super-credits for ultra-low emission vehicles. Increasing flexibility on implementation dates for LCVs is visible within the Commission, for example in exchange for setting a long-term target or for offering alternative, less costly CO₂ reductions, e.g. through efficiency improvements of auxiliaries and components.

Position: CLEPA believes that the industry should constructively engage in discussions with policy-makers on the planned CO₂ targets for light commercial vehicles (LCVs) so that the automotive industry obtains realistic legislative requirements. As in the case for cars, technologies exist that can further reduce CO₂ emissions from LCVs. However, the supplier industry feels that the targets outlined in the Commission Communication (2007) 19 are unrealistic with regard to lead-times. The initially envisaged implementation date of 2012 is not feasible. CLEPA therefore encourages discussions in the Commission on a more realistic timeline for implementation. Setting the target of 175g/km for 2015 would give the industry additional lead-time that is much needed.

Auxiliaries and components, as in the case for passenger cars, have further potential for CO₂ reductions both in the short- and long-term. CLEPA therefore calls on decision-makers to set incentives in this area via eco-innovations that go at least to the same cap level as in the passenger car Regulation, so as to increase flexibility of implementation. Such flexibility could be further increased by offering incentives for ultra-low emission vehicles in the form of super-credits. As is the case for passenger cars, a review in 2014 could look at the

modalities for reaching the long-term target, including the appropriateness of other parameters including payload.

The earlier the industry knows about reduction requirements, the lower implementation costs will be. CLEPA therefore encourages the Commission to make a realistic proposal in 2009 that includes flexibilities for implementation. As lead-times and product cycles are longer than for cars, planning certainty is particularly important for light commercial vehicles.

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CLEPA is the European umbrella membership organisation representing the interests of the global automotive supply industry. 82 of the world's most prominent suppliers for car parts, systems and modules and 28 National trade associations and European sectoral associations are members of CLEPA, representing more than 3,000 companies, employing more than three million people and covering all products and services within the automotive supply chain. Based in Brussels, Belgium, CLEPA is recognized as the natural discussion partner by the European Institutions, United Nations and fellow associations (ACEA, JAMA, MEMA, etc).

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